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September 29, 2020

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BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Jennifer Eckhart and Cathy Areu v. Fox News Network, LLC, et al.*, Civil Case No. 1:20-cv-05593

Dear Judge Abrams:

Defendants Fox News Network, LLC, Tucker Carlson, Sean Hannity, and Howard Kurtz ("Fox Defendants") hereby request the court's permission for a 5-page extension of the page limit to file the attached Rule 11 motion for sanctions and the supporting memorandum of law against Plaintiff Cathy Areu and her counsel.

There is good cause for the extension so that the Fox Defendants can explain why sanctions are appropriate notwithstanding Plaintiff Areu's amended complaint. In accordance with Federal Rule of Civil Procedure 11(c)(2), Defendants served a draft Rule 11 motion on Plaintiff Areu and her counsel on August 7, identifying multiple frivolous claims and allegations contained in her original complaint. The draft memorandum of law was 25 pages long, which is the maximum length allowed under this Court's Individual Rule 4.A. After the Fox Defendants served their draft Rule 11 motion, Plaintiff Areu retained new counsel and filed an amended complaint on September 11. The amended complaint, however, fails to withdraw or appropriately correct her frivolous claims and allegations. Accordingly, Defendants require five additional pages to explain why the amended complaint does not cure the Rule 11 violations, and why sanctions thus remain appropriate.

Pursuant to Local Civil Rule 11.1(b), the extended memorandum of law is double-spaced and set in 12-point proportional font.

Respectfully submitted,



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/s/ Kathleen M. McKenna

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